

Clerk, U.S. District Court  
Southern District of Texas  
FILED

JUL - 8 2013

A091 (Rev. 8/01) Criminal Complaint

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA  
V.  
Michel QUINTERO  
Roberto Saul VILLASENOR-Aguilar

## CRIMINAL COMPLAINT

Case Number: V-13-70M

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about July 7, 2013 in Jackson County, in the  
(Date)

Southern District of Texas defendant, Michel QUINTERO &amp; Roberto VILLASENOR

did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 1324  
I further state that I am a(n) Special Agent and that this complaint is based on the  
following facts: Official Title

See Attached Affidavit of ICE Special Agent

Roberto Hein

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Roberto Hein

Printed Name of Complainant

Sworn to before me and signed in my presence, and probable cause found on

July 8, 2013

Date

at

Corpus Christi, Texas

City and State

B. Janice Ellington U.S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

### Affidavit in Support of Criminal Complaint

On July 7, 2013 at approximately 4:00 a.m., Jackson County Sheriff's Deputy Bryon Novak initiated a traffic stop of a Mercury Mountaineer bearing Texas license plates BSY-5308 on U.S. Highway 59 near Edna, Texas. The vehicle was stopped for a traffic violation and was made without incident. Deputy Novak found the vehicle to be carrying a total of eleven (11) people. Deputy Novak identified Michel QUINTERO, the registered owner of the vehicle, in the driver's seat and Roberto Saul VILLASENOR-Aguilar in the front passenger seat. Deputy Novak was unable to communicate in the English language with the rear seat passengers and therefore contacted the Corpus Christi Border Patrol for assistance. Border Patrol Agents later determined that QUINTERO and VILLASENOR, the two (2) front seat occupants of the vehicle, were both United States Citizens. VILLASENOR claimed to have spent his entire life living in Mexico. In fact, VILLASENOR claimed his last entry into the U.S. was illegally made by crossing through the Rio Grande River. The other nine (9) passengers were determined to be illegal aliens from Mexico, Honduras and Guatemala. All eleven (11) persons were transported to the Corpus Christi Border Patrol station for further investigation.

#### Statement provided by driver Michel QUINTERO

At the Border Patrol station in Corpus Christi, Michel QUINTERO, the driver and registered owner of the vehicle, was provided her Miranda Warning and agreed to provide a statement. The following is a summary, in relevant part, of the statement provided by QUINTERO. On the evening of July 7, 2013, while in Edinburg, Texas, QUINTERO received a call from her boyfriend Saul (Roberto Saul VILLASENOR-Aguilar) instructing her to come and pick him up. VILLASENOR and another individual who remained unidentified provided QUINTERO directions via VILLASENOR's cell phone. The unidentified person told QUINTERO she would be picking up nine (9) additional people. QUINTERO picked up VILLASENOR and the nine (9) others off the side of the road sometime after midnight on the July 7<sup>th</sup> between Falfurrias and Riviera, Texas off Highway 285. The unidentified guide did not enter the vehicle with the others. QUINTERO was to be paid an unknown amount to transport the group to Houston.

Roberto VILLASENOR declined to provide a statement without a lawyer being present.

The remaining nine (9) illegal aliens initially declined to give statements however they later freely and voluntarily provided statements.

#### Statement provided by smuggled alien Gregorio MARTINEZ-Sanchez

The following is a summary, in relevant part, of the statement provided by MARTINEZ. MARTINEZ is a citizen and national of Mexico who has been previously deported from the United States. MARTINEZ made arrangements with a person in Mexico to be smuggled to Houston, Texas for \$2,800. MARTINEZ later illegally entered the U.S. with a group of others who then stayed at a house in McAllen. MARTINEZ eventually

began walking through the brush around the Border Patrol checkpoint. MARTINEZ identified VILLASENOR as the brush guide. They eventually arrived at a highway and VILLASENOR made a call on the phone. Shortly thereafter a vehicle arrived. The group got into the vehicle and they drove away. MARTINEZ identified QUINTERO as the driver of the vehicle.

Statement provided by smuggled alien Carlos Roberto RIVERA-Villanueva

The following is a summary, in relevant part, of the statement provided by RIVERA. RIVERA is a citizen and national of Honduras who has been previously deported from the United States. RIVERA paid a person in Honduras \$5,000 to be smuggled into the U.S. RIVERA later entered the United States by illegally crossing the Rio Grande River with a group of others and then stayed in a house in or near McAllen, Texas. RIVERA eventually walked with a group of others for three (3) days in the brush. The group was guided by an unidentified individual through the brush and to a highway. Upon arriving at a highway, a vehicle arrived and the group then entered the vehicle. RIVERA identified QUINTERO as the driver of the vehicle and VILLASENOR as being in the front passenger seat of the vehicle.

Review of a U.S. Border Patrol G-166, Report of Investigation dated May 25, 2013, revealed that on May 25, 2013, Roberto Saul VILLASENOR-Aguilar was arrested by DPS State troopers following a high speed chase in or near El Torro, Jackson County Texas. U.S. Border Patrol agents in Corpus Christi, Texas later determined the vehicle driven by VILLASENOR was transporting ten (10) illegal aliens. Prosecution of VILLASENOR for Title 8 USC 1324 was not sought at the time as VILLASENOR was a minor.

The other nine (9) smuggled illegal aliens were also interviewed regarding the events that led to their arrest at the U.S. Border Patrol station. None of the illegal aliens provided exculpatory information regarding QUINTERO or VILLASENOR.

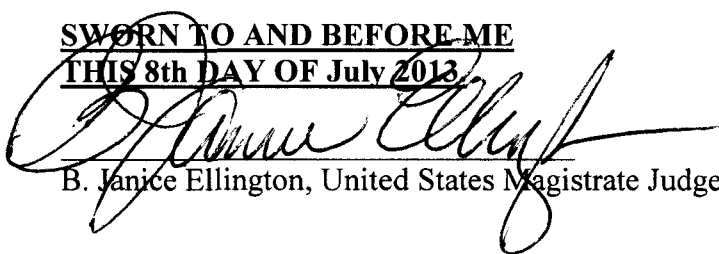
AUSA Patti Booth accepted prosecution of Michel QUINTERO and Roberto Saul VILLASENOR-Aguilar for Title 8 USC 1324.



Roberto Hein  
Special Agent  
Homeland Security Investigations (HSI)

**SWORN TO AND BEFORE ME**

**THIS 8th DAY OF July 2013**



B. Janice Ellington, United States Magistrate Judge